

**To:** Brock, Martha[Brock.Martha@epa.gov]  
**Cc:** Johnson, MaryC[Johnson.MaryC@epa.gov]; Alexander, Shanna[Alexander.Shanna@epa.gov]; Richards, Jon M.[Richards.Jon@epa.gov]; Froede, Carl[Froede.Carl@epa.gov]  
**From:** Amoroso, Cathy[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C5033745779E4121B626D62341A9B89C-AMOROSO, CATHY]  
**Sent:** Thur 4/8/2021 3:30:48 PM (UTC)  
**Subject:** ORR administrators decision implementation - dilution factor issue  
[DQO Step #2 and #5 16MAR2021.docx](#)  
[Sample calculation of rad discharge limit 16MAR2021.docx](#)

Martha,  
I don't think the 64X dilution factor is set in stone. It was a verbal proposal by UCOR at a project team meeting. There was a slide deck presented that included some stream flow information, but I don't have the slides. I'm cc'ing the rest of the project team to see if anyone has anything to add about a dilution factor of 64. I believe it is based on the median stream flow at BCK 4.5 compared to BCK 9.2 (we had a discussion about mean vs media) – Shanna may remember more.

Attached are two informal project documents that refer to a dilution faction, but neither provides a specific dilution factor (64 or otherwise).

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**From:** Brock, Martha <Brock.Martha@epa.gov>  
**Sent:** Thursday, April 8, 2021 10:13 AM  
**To:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Cc:** Johnson, MaryC <Johnson.MaryC@epa.gov>  
**Subject:** 64X

Could you share what DOE has put in writing about where the fishing hole is and how they are calculating to end up at 64X "dilution".

Martha Brock  
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If the agency's interpretation deviates from prior policy, the agency must provide a reasoned basis for the change. *Encino Motorcars, LLC v. Navarro*, 136 S. Ct. 2117, 2125–26 (2016).